UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Jacobs Trading Company, LLC, a Delaware Limited Liability Company, and Irwin L. Jacobs, Court File No.: 13-CV-3060 (RHK/TNL)

Plaintiffs,

v.

ESA Marketing, Inc., a Wisconsin Corporation, and Blaine Bundy, a Wisconsin resident, and Lakeshirts, Inc., a Minnesota Corporation

Defendants.

MOTION FOR ENTRY OF JUDGMENT PURSUANT TO FED. R. CIV. P. 54

TO: DEFENDANTS ABOVE-NAMED, AND THOMAS F. HUTCHINSON, AND EASTLUND SOLSTAD CADE HUTCHINSON & YSEBAERT LTD., 4200 COUNTY RD 42 WEST, SAVAGE, MINNESOTA 55378, ATTORNEYS FOR DEFENDANT LAKESHIRTS, INC.

Plaintiffs Jacobs Trading Company, LLC and Irwin L. Jacobs respectfully move the Court for its order directing entry of judgment against Defendants ESA Marketing, Inc. and Blaine Bundy for the relief demanded against said Defendants under Counts I and II of the Complaint.

Said motion is based upon the default entered against said Defendants on December 9, 2013 (Doc. 15), the accompanying memorandum in support thereof, Affidavit of David A. Mahler, and upon all files, records and proceedings herein.

Dated: January 28, 2014 Respectfully submitted,

MASLON EDELMAN BORMAN & BRAND, LLP

s/ Geoffrey P. Jarpe

Geoffrey P. Jarpe (#49761) 3300 Wells Fargo Center 90 South Seventh Street Minneapolis, Minnesota 55402

Phone: (612) 672-8200

ATTORNEY FOR PLAINTIFFS